

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

BLOCKCHAIN ASSOCIATION,
TEXAS BLOCKCHAIN COUNCIL, and
DEFI EDUCATION FUND

Plaintiffs,

v.

INTERNAL REVENUE SERVICE,
UNITED STATES OF AMERICA,
UNITED STATES DEPARTMENT OF THE
TREASURY, and
SCOTT BESSENT, in his official capacity as
Secretary of the Department of the Treasury,

Defendants.

CASE NO.: 3:24-cv-03259-X

Judge Brantley Starr

**STIPULATION OF VOLUNTARY
DISMISSAL WITHOUT PREJUDICE**

The parties hereby stipulate to voluntary dismissal of this action without prejudice because the case has become moot now that Congress has enacted, and the President has signed, a law rendering without legal force or effect the Department of the Treasury and Internal Revenue Service regulation that Plaintiffs challenge.

Plaintiffs Blockchain Association, Texas Blockchain Council, and DeFi Education Fund sued Defendants the Internal Revenue Service, the Department of Treasury, and Secretary Bessent challenging the Treasury and IRS regulation captioned *Gross Proceeds Reporting by Brokers that Regularly Provide Services Effectuating Digital Asset Sales*, 89 Fed. Reg. 106,928 (Dec. 30, 2024) (Final Rule). *See* Dkt. No. 1.

On February 10, 2025, the Court ordered Plaintiffs to file a status report indicating whether they thought this case would become moot. *See* Dkt. No. 22. In their status report, Plaintiffs noted that a joint resolution had been introduced in Congress disapproving of the Final Rule under the

Congressional Review Act, 5 U.S.C. § 801 *et seq.* *See* Dkt. No. 23, at 1 (citing H.J. Res. 25, 119th Cong. (2025)). Plaintiffs noted that they would promptly inform the Court if the legislation passes. *See id.* Both Houses of Congress have now passed, and the President has signed, that joint resolution, House Joint Resolution 25. *See* Providing for Congressional Disapproval Under Chapter 8 of Title 5, United States Code, of the Rule Submitted by the Internal Revenue Service Relating to “Gross Proceeds Reporting by Brokers That Regularly Provide Services Effectuating Digital Asset Sales,” Pub. L. No. 119-5, 139 Stat. 48 (2025).

Consistent with the Congressional Review Act, Joint Resolution 25 provides that the Final Rule “shall have no force or effect.” *Id.*; *see* 5 U.S.C. § 801(b)(1) (“A rule shall not take effect (or continue), if the Congress enacts a joint resolution of disapproval.”). Moreover, a rule that Congress has disapproved “may not be reissued in substantially the same form, and a new rule that is substantially the same as such a rule may not be issued, unless the reissued or new rule is specifically authorized by a law enacted after the date of the joint resolution disapproving the original rule.” 5 U.S.C. § 801(b)(2).

Counsel for the parties have conferred. The parties agree that, in light of the enactment of Joint Resolution 25, the Final Rule has no force and effect, meaning this action is now moot. Thus, Plaintiffs and Defendants, through their undersigned counsel, stipulate and agree that this action is voluntarily dismissed pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii). This dismissal is without prejudice. *See* Fed. R. Civ. P. 41(a)(1)(B).

DATED: April 16, 2025

Respectfully Submitted,

By: /s/ Shay Dvoretzky
Shay Dvoretzky

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CERTIFICATE OF SERVICE

I hereby certify that on April 16, 2025, I electronically filed the foregoing Stipulation of Voluntary Dismissal Without Prejudice with the Clerk of the Court for the United States District Court for the Northern District of Texas by using the CM/ECF system. I certify that all participants in the case are registered CM/ECF users and that service upon counsel for the government will be accomplished by the CM/ECF system.

DATED: April 16, 2025

Respectfully Submitted,

By: /s/ Shay Dvoretzky
Shay Dvoretzky